

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

| | | |
|----------------------|---|--------------------------------|
| ANGELA STEWART, |) | CIVIL ACTION NO. 3:20-CV-00679 |
| |) | JURY DEMAND |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| |) | |
| HEALTHCARE REVENUE |) | |
| RECOVERY GROUP, LLC, |) | |
| |) | |
| Defendant. |) | |

CONSENT MOTION FOR EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING

COME NOW, Plaintiff and Defendant Healthcare Revenue Recovery Group, LLC (“Defendant”) and file this *Consent Motion for Extension of Time to File a Responsive Pleading* and would respectfully show the Court the following:

The current deadline to file a response is September 17, 2020. Defendant’s counsel has conferred with counsel for Plaintiff and Plaintiff is agreeable to an extension of the deadline for Defendant to file a responsive pleading through and including October 8, 2020 so that the parties may further explore the possibility of reaching an early resolution of this matter.

WHEREFORE, Plaintiff and Defendant jointly request this Court to enter an Order extending the deadline for Defendant to file a responsive pleading to Plaintiff’s Complaint through and including October 8, 2020.

A Proposed Order is attached hereto.

DATED: September 17, 2020

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

/s/Heather Gwinn Pabon

Heather Gwinn Pabon, BPR 25931
3401 Mallory Lane, Suite 120
Franklin, Tennessee 37067
Phone: (615) 772-9010
hgwinn@grsm.com

Attorney for Defendant
Healthcare Revenue Recovery Group, LLC

/s/Paul K. Guibao

Paul K. Guibao, BPR 20467
242 Poplar Ave.
Memphis, TN 38103
Phone: (602) 445-9819
pguibao@ThompsonConsumerLaw.com

Attorney for Plaintiff
Angela Stewart

CERTIFICATE OF SERVICE

I, Heather M. Gwinn Pabon, do hereby certify that on September 17, 2020, I did cause a true and correct copy of the within *CONSENT MOTION FOR EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING* to be filed and served electronically on all counsel of record, whom are indicated below, via CM/ECF:

Paul K. Guibao
242 Poplar Ave.
Memphis, TN 38103
Telephone: (602) 445-9819
Email: PGuibao@ThompsonConsumerLaw.com

Signed: /s/ Heather Gwinn Pabon
Heather Gwinn Pabon